IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,	)	
	)	
v.	)	CASE NUMBER
	)	1:26-CR-149-VMC-JEM
MATTHEW SOUZA	)	
Defendant	)	

SENTENCING MEMORANDUM OF MATTHEW SOUZA

In pursuit of a just and reasonable sentence, MATTHEW SOUZA, by and through undersigned counsel, submits this sentencing memorandum. Having pled guilty on June 11, 2026, to two counts of making threatening communications, in violation of 18 U.S.C. § 875(c), (Doc. 21), Mr. Souza now asks the Court to impose a time served sentence, followed by a period of supervised release. While that represents a variance below the Guideline range, a time-served sentence is justified by the 18 U.S.C. § 3553(a) sentencing factors, particularly the history and characteristics of the defendant and the need to foster his continued rehabilitation. Matthew Souza is a loving son and brother, a devoted partner to his fiancé, and eagerly expectant father. Matthew held biased beliefs and conveyed horrible messages in this offense, a year ago. But he has learned from his mistakes, reoriented his perspective, and is now committed to devoting himself to family and community in a positive way. Federal supervision will support that, and no additional jail time is necessary.

Background Information

Matthew Souza was born in Belo Horizonte, Brazil, on July 5, 2001. Matthew recently celebrated his 25th birthday, while in custody at the Robert A. Deyton Detention Facility (hereinafter "RADD"); at the time of the offense conduct, though, he was just 23 and 24 years old.

Matthew is oldest of three brothers. His younger brother, Marcus Souza, is aged 20. Marcus works as a server at a restaurant called Buffalo Café. He is creative and artistic, and has a passion for theatre. Matthew and Marcus are opposites in many ways—Matthew conservative, Marcus liberal; Matthew introverted, Marcus more extroverted—but the two love and support one another despite their differences. Matthew's youngest brother, Lucas Souza, is just 4 years old (Matthew's parents had Lucas late in life). Lucas is autistic and nonverbal, requiring specialized attention from caregivers. Prior to his arrest, Matthew visited his parents weekly and helped a great deal with Lucas. Though Matthew has a positive relationship with both his younger siblings, he is especially close with, and attentive to, Lucas—almost a third parent for the young boy.

Matthew spent his early childhood years in Brazil, where Matthew's father, Ray Souza, worked as a church pastor and Matthew's mother, Rachel Souza, worked as a teacher. Ray was Brazilian and grew up poor, in the favelas. Rachel

also grew up in Brazil, but she was born in the United States and her parents were U.S. citizens. Rachel's parents, Mark and Paula, were Christian ministries who moved to Brazil to establish a church and school in Belo Horizonte. There, Ray and Rachel met, married, and had Matthew and Marcus. Ray pastored the church, and Matthew and Marcus attended the private Christian school, that Mark and Paula founded. From the beginning, the family was close knit and loving.

The family decided to move to the U.S. in July 2010, when Matthew was nine years old. The family felt called by God to move to the U.S., but they also sought a better life for Matthew and Marcus. In Brazil, although Matthew's family lived in a clean and stable apartment—nicer than the homes his cousins lived in and dad had grown up in, in the favelas—still the family was surrounded by violence and poverty. Matthew's parents did not allow him leave the apartment because of the dangers in the area. The U.S. offered a significantly safer environment for the kids, with more opportunities.

Matthew's family originally immigrated to Monongahela, Pennsylvania, a suburban city connected to Pittsburgh. They moved in with Rachel's parents, Mark and Paula, who had returned to the U.S. some years before. But Matthew's dad, Ray, struggled to find a job in the Pittsburgh area; so after six to eight months the family moved again to northeastern Maryland. There, Ray found a job as a pastor at Life Community Church, and the family stayed three or four years, until

the summer of 2014. That's when the family relocated yet again, this time to Gwinnett County, Georgia. The family came specifically to get connected to Gwinnett Church, led by popular mega-church pastor Andy Stanley.[1] Though Ray failed to secure a pastoral position at the church, the family nonetheless joined and got very involved with Gwinnett Church. Ray pursued other jobs until he founded the church for which he now serves as co-pastor: Good News Church, in Buford.[2] Rachel was also able to support the family through her work as a parent liaison and translator at a school. Today, Ray and Rachel live in a large house in Buford, with Matthew's brothers, Marcus and Lucas, and Rachel's parents, Mark and Paula. The family is very closely connected.

Despite the eventually positive results of the family's journey, the multiple moves caused difficulties for Matthew's development and brought associated trauma. Matthew could not speak English when he first arrived in the U.S.. He had been academically successful in Brazil, but in the U.S. he struggled to understand and keep up with classmates. His grades suffered, and he faced bullying from classmates. Just as he began to get used to his new environment in Pennsylvania, his family relocated again to Maryland and Matthew had to start the struggle all over. He got in fights, largely arising from his language barrier.

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[1] *See* https://gwinnettchurch.org/.

[2] *See* https://goodnewschurchga.com/.

While in the fifth grade, Matthew was twice jumped and beaten up by groups of other kids. Additionally, while walking with a friend one day the friend was attacked by a group of older teenagers, with guns pointed at both boys. Matthew could only watch as his friend was severely beaten and later had to go to the hospital. More than any physical effects, these events instilled emotional and psychological trauma in Matthew. And the repeated family moves—especially after the family moved to Georgia, when Matthew was 13—led Matthew to develop feelings of anxiety, anger, and depression. Multiple studies have found that such conditions commonly arise after individuals have experienced multiple moves in childhood and teenage years.[3]

Instead of getting proper therapy or treatment for these negative emotions, Matthew put his faith and sought self-esteem in friends and girlfriends. Teenage Matthew also began to smoke marijuana. As he put it, "I started smoking and scrolling too much, and that took me away from the family and positive interests." He felt ashamed, and still regrets, that he did not focus more on his younger brother, when Marcus was going through struggles, or on the hobbies he had

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[3] *See, e.g.*, University of Plymouth, *Multiple Moves During Childhood Can Increase the Risks of Depression in Later Life*, SCIENCE DAILY, available at www.sciencedaily.com/releases/2024/07/240717120958.htm (accessed July 10, 2026); *Moving Repeatedly in Childhood Associated with Poorer Quality of Life Years Later*, American Psychological Association, available at https://www.apa.org/news/press/releases/2010/06/moving-well-being (accessed July 10, 2026).

previously enjoyed, like reading fiction and learning in school. Matthew never received treatment or any formal diagnoses for his anxiety or trauma effects.

After high school graduation, and especially in the months leading up to this offense, Matthew immersed himself in social media and encountered social media influencers who presented emotionally-charged, right-wing perspectives on the world. Though Matthew had friends who were Jewish and Black, he allowed himself to be influenced by Youtubers and influencers who propagated racist and prejudicial views. Matthew did not plan or take any steps to hurt anyone, but he did make comments on social media and to friends that were racist and violent in nature. He regrets that now tremendously.

Matthew's young adult life has not been wholly or even predominantly negative, however. He has continued to remain very close to his family. Especially after the birth of his younger brother, Lucas, Matthew contributed to his family by helping care for and spend time with Lucas. He moved in with his parents for the first two years of Lucas' life, to help care for the baby. And after Lucas' autism diagnosis, Matthew helped research and obtain resources so that Lucas could thrive and develop as much as possible. Matthew still (prior to his arrest) visits his parents and family every week, and he is active in the life of Lucas, and his young cousins. Matthew did not pursue university education, but he did get jobs, including at Racetrack, and he studied investments to become a stock

trader. Prior to his arrest, stock trading allowed Matthew to earn enough to support himself, and he wants to continue developing that career.

Following his arrest in March 2026, Matthew has reflected on his biased thinking and taken substantial steps to shift his perspective. Before and since his arrival at RADD, Matthew has read books about Judaism, and he has developed a sincere appreciation for Jewish religion, philosophy, and culture.

Matthew's perspective has also been transformed by his relationship with his fiancé, Nicole Kirilova, and their growing family. Matthew and Nicole started dating in the summer of 2025. When they found out she was pregnant, Matthew moved in with Nicole and her parents, Nataliya Ilieva and Mariyan Zahariev, to better support Nicole. Since moving in with Nicole's family in late 2025, Matthew has become close with Nicole's parents and contributes to the housework, including doing the brunt of renovation work currently going on in the house. Nicole and he are excited about the arrival of their son, Jonathan, who is expected in late July or early August. For Matthew, the relationship with Nicole and recognition of fatherhood has drastically shifted his focus: making his first and only priority the care and nurturing of Nicole, their baby, and their larger family. As Nicole faced some complications in the early stages of the pregnancy, Matthew got involved in her prenatal care and medical journey, driving her to appointments and supporting her through all challenges and steps. He wants

desperately to be there for the late stages of pregnancy and birth of their son—a once-in-a-life time moment for him as a father, but also a time in which Nicole will need his support.

Argument for a Reasonable Sentence

The Sentencing Guideline Range

The Presentence Investigation Report ("PSR") calculates Matthew Souza's total offense level as 20. (PSR at ¶ 97). This is based upon (1) a base offense level of 12, pursuant to U.S.S.G. § 2A6.1(a)(1); (2) a suggested 6-level upward adjustment, pursuant to § 2A6.1(b)(1), because the offense purportedly involved conduct evidencing an intent to carry out the threat; (3) a 2-level increase, under § 2A6.1(b)(2)(A), because the offense involved more than two threats; (4) a 3-level addition, under § 3A1.1(a), because the defendant allegedly selected one or more victims "based on their race, color, religion, national origin, ethnicity, gender, gender identity, disability, or sexual orientation of any person"; and (5) a 3-level downward adjustment for acceptance of responsibility, pursuant to § 3E1.1(a) and (b). (*Id.* at ¶¶ 80-97). The PSR correctly notes that Matthew has no prior criminal convictions and thus no criminal history points; he is in criminal history category

I. (*Id.* at ¶¶ 100-102). This PSR's total offense level and criminal history category yield a Guideline sentencing range of 33 to 41 months. (*Id.* at Part D, p. 28).

The adopted Guideline range should be lower than this, however, because no upward adjustment should be applied under § 2A6.1(b)(1), for conduct showing intent to carry out threats, or under § 3A1.1, for selection of victims based on their racial, religious, or other identity. Without these enhancements, the correct offense level is 12, and the resulting Guideline range is and should be 10 to 16 months. We will now address each of these Guideline objections in turn, before explaining why a time-served sentence is justified by 18 U.S.C § 3553(a).

I. No enhancements should be applied based on evidence of intent to carry out threats.

Because Matthew did not take any actions to carry out threats, nor any actions reflecting an *intent* to carry out threats, the Court should decline to apply the PSR's proposed 6-level enhancement under § 2A6.1(b)(1). To that end, we object to Paragraphs 81 and 88 of the PSR. Counsel for the Government, Assistant United States Attorney Conor Woods, has informed the Defense that the Government does *not* oppose our objection to this enhancement. Since it is the Government's burden to establish evidentiary basis for the enhancement—to prove both that acts were performed *and also* that such acts evidenced a malicious

intent to carry out threats—absent presentation of evidence and argument from the Government to support the enhancement, the enhancement should not stand.

Nevertheless, we will address the PSR's suggested basis for the enhancement. It identifies Matthew's purchase of three firearms and body armor, at a Lawrenceville, GA, gun show on March 8 2026, as the conduct evidencing an intent to carry out threats. (PSR at ¶¶ 81, 88). However, that purchase of firearms was wholly disconnected from and unrelated to the threatening communications that Matthew had earlier conveyed. A number of points and pieces of evidence show that lack of connection (between gun purchases and threats) and lack of any intent to carry out threats.

First, Matthew's purchase of guns at the Lawrenceville gun show came eight months after the threatening communications identified in the indictment, and three months after the last known antisemitic or racially offensive message. (*See* PSR at ¶¶ 2-3, 21). The period of time between those prior messages and that latter gun purchase was a period of immense change in Matthew's life, with a shift in perspective and goals. During that time period, Matthew developed a relationship with the love of his life, got engaged, moved in with his fiancé, learned and prepared for a baby to be born, and devoted himself to caring for Nicole and assisting her family with their household. Matthew did not take any steps to act on his threatening messages and his actions in the months following the messages

show that he had no intent to harm anyone. Instead, he was devoting himself increasingly to family and new parenthood.

Second, Matthew's purchase of guns reflected an interest in guns and self-defense that was long-standing, extant in Matthew long before 2025, conveyed the threatening communications in this case. To put it frankly, Matthew was a gun guy. He liked guns. He thought they were cool. He believed in the 2nd Amendment as a patriotic sign and important right. He believed in self-defense and thought he outght to have guns to protect his family. These are beliefs that are shared by millions of Americans. Body armor is less common than ordinary firearms, but body armor appeals to a great many young people—and especially appeals to a 24-year-old boy—for similar reasons that firearms appeal to those individuals. It's a cool toy. It reflects a desire for self-defense. The fact that Matthew purchased guns and body armor at the gun show does *not* tell us what he intended to do with those items, with any particularity, but the purchase could have been motivated by and associated with whole hosts of innocent, even admirable intentions and plans. In fact, that was the case here: Matthew's purchase reflected a general interest in guns and concern for self-defense.

Supporting this point is the fact that Matthew had purchased guns at gun shows previously, well before 2025. Matthew had a recreational interest in guns, and liked to keep them both for target shooting and for self-defense. When

arrested in Florida on March 9, 2026, while vacationing with his fiancé, Nicole, Matthew did not have any of the guns that he had purchased at the gun show on March 8th. Clearly, then, he had not rushed to purchase the gun show guns so that he could go out and use them or carry out any threatened violence. Rather, he took all the purchased guns and the body armor back to his house and put them in a closet. (See PSR at ¶ 57). He gave one of the guns to Nicole, as a gift for her to use for *her* own protection. (*Id.* at ¶ 48). Then, Matthew was found with a wholly separate gun when he was arrested in Florida. This was a small hand-gun, a .40-caliber pistol, kept for his and Nicole's protection while traveling. (*Id.* at ¶ 45). Nothing about the gun show gun purchase, the post-purchase behavior with the guns, or the trip to Florida, reflects or evidences that Matthew was carrying out or intended to carry out an act of violence. To the contrary, the purchase of guns and his behavior with the guns shows that he was buying them for lawful purposes and with lawful intents, wholly unrelated to the threatening communications made the previous year.

Third, affirmative testimony from Matthew and people who knew him shows that he did not have any intent, nor did he make any plans, to commit violence or otherwise hurt any individuals. At the time of his arrest, Matthew readily admitted and honestly disclosed that he had conveyed threatening messages and posts. Nothing suggested that he hid anything from agents or was

dishonest in any way; he even told agents about concerning online activity he engaged in about which they did not previously know. (*See* PSR at ¶¶ 51-56). In the course of this forthright admission, Matthew told agents that he had no intention to hurt Jewish people, attack any synagogue, or commit any violence. (*Id.* at 53). He honestly revealed his intent—or lack thereof. Other people, including Matthew's dad, Ray, told agents that Matthew had never said anything that reflected a desire or plan to commit violence. (See *id.* at 30). And Jacob Etheridge, Matthew's former roommate, with whom Matthew engaged in racially charged, antisemitic, and homophobic conversations, told agents that he and Matthew never discussed carrying out a threat against any group or person. (*Id.* at 72). Thus, affirmative witness and testimonial evidence shows that Matthew did *not* have any intent to carry out a threat.

Finally, it is legal to purchase and possess firearms. Matthew was not a prohibited person at the time of the 2025 offense or the 2026 gun purchase; rather, he was a citizen with full rights to buy and keep firearms. While he may have made a mistake regarding the proper address he was supposed to put on the purchase forms (based on instructions from the seller), he went through a lawful process to buy the firearms. (*See* PSR at ¶¶ 38-42, 52). Likewise, guns that he had previously purchased were bought and possessed lawfully. They weren't stolen, bought off the street, unmarked or untraceable. They weren't purchased or

possessed in a way that reflected an intent to conceal the guns or use them surreptitiously. Rather they were purchased publicly, according to the lawful process, and they were stored safely within Matthew's home.

II. No enhancement should be applied based on the defendant selecting victims due to their identity.

Matthew did not intentionally select any victim as the object of the offense because of their race, color, religion, or other identity trait of any person; therefore no enhancement should be applied under § 3A1.1(a). Specifically, we object to Paragraphs 83 and 90 of the PSR. This enhancement is not appropriate for a number of reasons:

First, neither the Government nor the PSR have identified any particular victims of the offense. The threatening communications that Matthew conveyed referred to Jewish people generally, not to any selected individuals or even an identified group of individuals. This does not make the communications any less condemnable or offensive—they are both—but it means that there is a necessary element to this enhancement that is lacking. To apply § 3A1.1(a), the Court would need to find that Matthew "intentionally selected any victim … as the object of the offense of conviction" because of the identity trait of that person. But while warnings might have been sent to synagogues based on Matthew's concerning posts, Matthew did not mention, identify, or direct his remarks to any synagogue, group, or individual. He posted comments on a public speech and messaging

platform, X, for his followers, and possibly members of the public, to see.[4] The lack of any identified victims suggest that there may have been no actual victims of this offense. We do not actually know if any particular Jewish people read any of Matthew's posts. In that case, the enhancement of course cannot apply. But even if the Government *were* to identify some particular victims, it would need to also show that Matthew himself knew—and "*intentionally selected*"—those victims as "objects of the offense." Instead, Matthew made general posts, accessible to his followers and/or the public, and with no identification or selections of victims who might be harmed by the communications or who might perceive the threat of injury.

Concluding that a threat to Jews generally makes every Jewish person a victim is an untenable and unreasonable leap, inconsistent with the requirements of the statute of conviction and the Guideline provision in § 3A1.1. If I were to post a message stating "Maryland I'm coming for you!" could all Maryland residents now be considered selected victims, 18 U.S.C. § 375(c) or U.S.S.G. § 3A1.1? When the great Miles Davis said, "if I had an hour to live, I'd spend it

[4] It is not clear from the evidence whether Matthew's posts were publicly accessible, or only available to Matthew's social media followers. If they were private messages, accessible only to followers, then it is even more likely that there were no victims of this offense, i.e. no actual Jewish people who read and perceived threatened injury from the messages. Without Government-provided evidence regarding this issue, there is insufficient evidence to establish the existence of victims.

choking a white man, nice and slow," did all white men in the world become selected victims? Would § 3A1.1 be applied in his conviction and sentence? No, these threatening statements, like Matthew's messages, are general in nature and without any particularly targeted victims. As such, the Court cannot find that Matthew intentionally selected any victims on the basis of their identity.

To support application of this § 3A1.1 enhancement, the Government bears the burden of proving that Matthew identified and directed his comments at victims. Then the Court must find, *beyond a reasonable doubt*, that the defendant "intentionally selected any victim." The Government also bears the burden of proving that Matthew selected those victims precisely on the basis of their identity, or precisely because of their identity. Only if the Court finds beyond a reasonable doubt that this was Matthew's motive can the enhancement be applied. He can't have posted the messages to gain attention. He can't have made the statements to provoke political or social debate. He had to select victims, to harm or scare them because of those victims' identity. Not only has the Government not shown that Matthew intentionally selected particular victims, but it has not presented any evidence to show what Matthew's motive was behind the posting of communications. We've admitted here that Matthew had biased views at the time of this offense, but that does not prove that his intention behind the posts was to convey threats to selected individuals on the basis of *their* identities. He could

have made anti-Jewish statements for a variety of other reasons. And he could have—perhaps did, with his twisted perspective at the time—post the messages with no intention for them to be read by actual Jewish people, but only by other non-Jewish people who might agree with him. Regardless, the Government would need to present evidence of his victim selection and his harmful intent, and the Court would need to find that he selected victims and had the intent beyond a reasonable doubt. That hasn't happened and should not happen in this case.

Consideration of the § 3553(a) Factors

The sentencing factors to be weighed, pursuant to 18 U.S.C. § 3553(a), support the imposition of a time-served sentence, followed by supervised release. First, the history and characteristics of Matthew Souza show that this offense, while serious, does not reveal a criminal who needs to be incapacitated and locked away from society. As the attached support letters reflect, Matthew is overwhelmingly a responsible, kind person—the type of person who cares for others and upon whom other people rely.[5] He is a loving partner to his fiancé, Nicole, supporting her in her journey of university education and through her pregnancy. He is a devoted son and older brother, who visits his family regularly, contributes to their financial well-being, and helps care for the youngest family member, who has high-level autism and special needs. He is kind to people he

[5] *See* Attachment A, *Letters of Support*.

meets and, in his actual life (rather than online) tolerant of people different than him. Matthew contributes much more than he takes from society, and notwithstanding his horrible decisions to convey threatening communications, Matthew is continuously improving as a caring citizen and person.

Considering the circumstances of this offense, we must acknowledge that his messages were disturbing, offensive, and wholly inexcusable. They were also factually inaccurate, reflecting a misunderstanding of the world and how groups of people interact within society. Matthew was not communicating from a properly informed place, understanding history and actual demographic data. Instead, Matthew was informed and influenced by social media personas who made false, alarmist claims and prejudicially labeled and described Jewish people and people of color. Matthew is himself an immigrant, from Brazil, and had diverse friends, so he should have rejected the messages that social media presented. But as a young person—just 23 and 24 at the time of the offense—with untreated mental health issues, Matthew was susceptible to the influence of right-wing conspiracy theorists, stoking anger, fear, and hate. Matthew's background of trauma and developmental challenges—particularly arising from family moves

and social bullying—also explain why he was especially susceptible to ideological claims based on fear of the other.

Notwithstanding the disturbing, concerning, and offensive nature of Matthew's offense, it solely consisted of words. Matthew did not take any actions to hurt anyone. Nor did he ever *intend* to hurt anyone, or commit any unprovoked violence. Matthew has taken responsibility for his conveying threatening communications, but he has also maintained, truthfully, that the communications were no more than communications. Furthermore, Matthew stopped posting such messages in late 2025, well before his arrest in March 2026. The process of personal change began then, when Matthew found out that Nicole was pregnant and moved in with her family.

The above considerations also show that a time-served sentence, followed by supervised release is sufficient to punish Matthew, afford adequate deterrence, and protect the public. Matthew has already learned from this prosecution and has a clear understanding that even words, when violent or racist in nature, have real harm and can be criminally sanctioned. He has taken steps to improve his mental and emotional state, such that he no longer holds the same biased views and will no longer be influenced by the hateful ideology of social media influencers. Instead of blaming Jewish people for the world's problems, Matthew is now studying Judaism, to learn from the wisdom of that religion and culture.

Likewise, Matthew recognizes that his white supremacist perspective was wholly false, ignorant, and dangerous. Instead of collecting hateful opinions of groups of people, Matthew is now committed to engaging different people in a loving way, as his family's Christianity prescribes.

Matthew has no prior criminal history, and though this offense reflects a dark direction toward which his mind descended, Matthew is now moving in a much more positive direction. With his fiancé, Nicole, and soon-to-be son, Jonathan, Matthew considers family his sole and highest priority. Even at the time of the offensive communications, Matthew would never have risked his family and life by committing an act of violence. But now he is even more committed to being a stable source of support for his family and a positive role model for his son. He will not commit any offense like this ever again.

A sentence of time served, followed by federal supervision, will promote Matthew's rehabilitation, which is already well underway due to Matthew's own initiative. By requiring and allowing Matthew to engage in mental health treatment, to address trauma and negative emotions for which he has never received care, supervision will help Matthew to better manage his emotions and resist (or ignore) negative ideological messages. The therapy that Matthew wants and needs will be available in society, while Matthew is under supervision; whereas it is not available in jail or prison. Thus, ending Matthew's custodial

sentence now, and putting him on supervised release is the next logical, proper step to helping him improve as a citizen and person. Simultaneously, that is also the best way to protect the public and deter future offenses. In short, a time served sentence, with supervised release, will meet the goals of sentencing under § 3553(a) while enabling Matthew to support his fiancé and care for his son in this crucially important stage of life. It will return Matthew to his supportive family, while ensuring that Matthew continues to develop into a loving, positively contributing person—the person he is at his core, and who he is meant to be.

Conclusion

For all the reasons presented above, and to carry out justice *sufficiently* and *effectively*, we ask the Court to impose a sentence of time served, followed by a period of supervised release. Such a sentence is adequately punitory while also giving Matthew Souza the opportunity to get treatment, support his fiancé and coming child, and continue to move his life in a healthy, law-abiding direction.

Respectfully submitted, this 10th day of July, 2026,

/s/ Ross Brockway
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To whoever may read this,

My name is Nicole Kirilova and I'm the fiancé of Matthew Alan Souza. I am writing this to share who Matthew is to me. I am currently 6 ½ months pregnant with our little boy and it's been a joyful journey. Originally we began speaking over snapchat on July 6th, 2025 and that very night we spent 6 hours talking on phone. We spoke every day on the phone for a month and he cared about how I slept, if I ate, and how I felt before we even met in person.

I first met Matthew in person on August 9th, 2025. He drove an hour and a half to pick me up for our movie date and met my whole family. He made it a point to knock on the door, formally introduce himself to my parents/family, and shake hands with them. He is a true gentleman and till this day never lets me open doors for myself - whether it's the car door or a regular store door, never lets me pay for anything, and treats me better than I would have thought was possible. It's evident in my everyday life how much he makes it a priority to taking care of me, even from very early on, and how he prides himself in being that for me.

We like to spend our time by working out, going on walks & hikes, he introduced me to sitting in nature and talking to God, slow dancing with me to our personal music playlist and/or the music that's on the tv of my parents living room when we all spend time together, and eating Ben & Jerry's ice-cream while watching sports/movies. Matthew also has shown me a bunch of wonderful sermons and preachers on YouTube. We practice gratitude by writing in journals what we're thankful for, share our thoughts on what we've learned from the videos, and have meditation sessions together that are a weekly tradition for us. He's taught and shown me this feeling of peace, gratitude, and unconditional love since meeting him.

Our relationship now, as his pregnant fiancé, has grown tenfold and so has his attention towards my needs and wellbeing. When I originally told Matthew I was pregnant - I was crying from the shock, the fear of becoming a parent, and what he would think - since we were only together for a short while. However, he made me feel so secure and safe, and while I was crying - he was smiling ear to ear. I can still recall how he reassured me that he will be there for every step of the way. He told me that his news was everything he had ever wished for, how he was so glad it was with me that he was entering this chapter in his life, and even thanked me for giving him the gift of becoming a father. Just a day after finding out - he moved in with me and my parents to make sure he was right by my side through everything and every moment.

During my first trimester, I was dealing with morning sickness, and he would give me pressure point massages that he found online to try to help as much as he could. He eventually got mommy morning sickness bands for my pressure points since I'm in school and he can't be there 24/7 to massage and hold me. He's never been frustrated with my food cravings, mood swings, and has always been there to comfort me - from the shock that I was still feeling at first - all the way to the worries I have about having a baby while so young and still in school. He drives me to all my doctors' appointments for the baby and has made it his mission to do anything I want and/or need. He is my rock in life and has been there for me before and throughout my pregnancy. I can even say that he's

attended every prenatal doctors appointment and keeps better track than I do on when I have one coming up (I have 'baby brain' real bad). He is terrified of missing out the birth of little Johnny and leaving me to go through it alone. This mother's day, my first one, he got me a necklace with his and Johnny's name.

In mid-December of 2025, I almost miscarried due to my placenta separating from my abdominal wall. When I found out and decided I should go to the hospital to check if me and the baby were alright – Matthew was spending time with his family like he usually tries to do once a week (we live in Acworth so he is driving an hour and a half away both ways sometimes). I didn't want him to worry and risk getting into an accident – so I kept it to myself. I was at the hospital for maybe 30 minutes before I got a call that from him asking if everything was alright since we share our locations with each other. When he found out why my location was at the hospital, and that I was bleeding lightly, he immediately drove from Buford to me. I wasn't even aware he was coming until I got the call from him that he was at the front desk and needed to know the room number. But that's just the kind of love and care that Matthew offers- he shows up for whoever and whenever. He's prepared me baths when I don't feel well and has cooked for me countless of times to make sure I'm eating properly.

As my pregnancy has progressed, he's been on top of every single one of my needs from sleeping, eating, my physical/mental well-being, and making sure I am never doing any heavy lifting. I joke to him that carrying our little boy is going to give me a run for my money since my arms have become so weak from being so babied myself. He's bought clothes, a car seat/stroller set, baby books, toys, and more. He even made it his mission to help me plan for our baby shower this June and helping me create a birth plan for when the time comes.

But he hasn't only catered to me and our child, as my father has severe cardiac issues - 6 heart attacks, 2 bypass surgeries, and now a pacemaker from when he was hospitalized from ventricular tachycardia in 2024. Doctors claim my dad heart is at 40% working capacity, and Matthew has made it his mission to protect not only my health, but dads and mothers as well. We are currently doing renovation in my parents home (where we live) to prepare for our child. Matthew has done all the heavy lifting and most of the labor to make sure no one is extending or straining themselves – putting everyone's health before his own. Never complaining or getting frustrated with anyone, even when I've seen him laying on the floor from exhaustion and physical pain from the labor.

Matthew is someone who is very family oriented. He attends church during the weeks when his father is the speaker to support. He tends to the needs of his family by always making sure they have everything they need before coming over and loves being with them as much as he can. He has two family group chats that he connects and writes in daily, one for his family in Brazil and another for his family in America, and it's his favorite thing to see what they've shared from their lives/updates. He is always showing me with the biggest smile or laugh some of his favorite moments from those groups chats.

His relationship with my parents is so special. He even calls them mom and dad. They are elated to call him their son. My dad has even told my mom in private "it is bad if I think I love him more than

you guys?". Him and my dad love spending time together after dinner to talk about cool ships or planes and UFC fighters they respect for their showmanship/skill -even sharing upcoming events that they want to watch together. They are practically the same person. Matthew is super protective of my mom and makes sure she never is bringing in heavy groceries, and when he catches her, he tells her all the time "mom let me help you please" (she's a go-getter and fierce). Often he buys groceries to prevent anyone from having to strain themselves with heavy waters or bags. My mom and him love having deep conversations about religion and sharing theories/stories on things they've read and learned. They've taken to him in a way that I have only ever wished for, and sometimes I feel like he has a better/closer relationship with them than I do.

Matthew's is going to be a great father. As I've seen in the way he takes care of his little brother who has autism. You would think that Lucas is his own child in the way he tends to him. He constantly (every few hours) reaches out to his mom to ask if she needs help and making sure that Lucas is having the best day – every day. His photo album on his phone is filled with pictures of Lucas and his entire family. Anytime he sees a toy that he think his little cousins, or Lucas, would like he buys it on the spot. Sometimes even spoiling his little cousins Jojo and Judah's dog with toys. On the 5th of May we even attended Jojo and Judah's end of school ceremonies and got to watch what they, and their classmates, learned this year. Of course we also brought gifts for the boys to show them how proud we are in their learning journeys and to congratulate them for their hard work this year.

I could go on with how much of a positive impact Matthew makes in the people in his life. He prides himself on being a strong and reliable figure in the lives of those around him - especially my own. My own cat, who I thought for a long time only claimed and liked me, has shown a deep fondness for Matthew. The measure of his character can't be summarized in a letter, but I hope that this will give you an insight into how special, kind, and caring he is as a person. He is the epitome of a loving brother, attentive son, and a wonderful future father.

Thank you for your time,

Nicole Marian Kirilova

May 8, 2026 [Written and sent the evening following Mr. Souza's detention hearing.]

Dear Mr. Brockway,

First of all, I would like to thank you for all your efforts and support thus far in Matthew's case. We are blessed to have you and appreciate you very much.

As I sat and listened to the prosecution today, my heart was heavy that the portrayal of Matthew's person was limited to just a few isolated days in the past year. While the evidence brought against him painted an unfortunate picture of my son, I do not believe it is any way accurate. If you would allow me, I would like to shine light on a broader image of the Matthew I know and love.

I understand that my perspective is biased. Of course it is! I am his mom, and moms are hardwired to love and protect their children. Nonetheless, I believe that mine is a more accurate depiction as I have known Matthew for 25 years and despite my great love for him, I am not blind to his flaws and shortcomings. However, the areas in which he falls short pale in comparison to all the things that make Matthew a great son of whom I am very proud.

Matthew is my first-born son and the oldest of 8 grandchildren. Most of his cousins are under the age of 10, yet he puts forth such effort to be present in their lives. He attends birthday parties, buys each one Christmas gifts, plays card games and outdoor games with them. At our last family Easter celebration, he had plastic candy-filled eggs taped to his shirt and ran all around the backyard while the children tried to catch him and get their eggs. Last night, the evening before this court appearance, he drove roughly three hours total to be present at his cousins' (ages 5 and 7) elementary school end-of-year celebration. Matthew loves his family and puts forth effort to be with us and participate in our family activities.

Additionally, Matthew is an amazing big brother to his autistic 4-year-old baby brother. When I found myself unexpectedly pregnant in my late forties, I wondered what a 20-year gap would mean and what kind of relationship these two would have. I shouldn't have been concerned at all. Matthew chose to stay at home with us after Lucas was born to help financially, as I had to quit my job, and has been an active participant in his life. Although Matthew moved out when Lucas was 2, his effort to come visit regularly and spend quality time with Lucas has resulted in a love and friendship between the two of them. Lucas, who is non-verbal, lights up when Matthew arrives and after hugs, smiles and squeals, he runs to retrieve their favorite toys and games to play together. It's so fun to watch.

After receiving Lucas's diagnosis, Matthew has been so supportive by seeking to understand Lucas's limitations and researching ways in which he can help Lucas thrive. He taught Lucas how to run, bought toys and games to support his learning and constantly

shares with us information and research to support his little brother. He has been a blessing and such an encourager in this journey.

As an adult son, Matthew stays in touch. He texts, calls and reaches out regularly. Prior to moving to Acworth, when he still lived in Buford, he would visit almost weekly and stop by for a home-cooked meal occasionally, always reaching out on his way and asking if I needed him to pick up anything. He loves to get us treats and desserts and will drive over to drop them off. He is prompt and reliable with payments for bills that are still under our accounts – such as phone, car insurance. He is financially independent and always offers to contribute toward family meals and vacations.

In December, the day after we received a phone call from the FBI concerning Matthew's posts, my husband, Matthew's dad, had a minor health scare at work. Knowing the reason his father felt ill was stress due to the call, Matthew dropped everything he was doing and drove to the Urgent Care where his dad's co-worker had taken him. He wanted to make sure he was okay and getting the treatment he needed. He also insisted on following him home in his car to be sure he got here safely. And that was the day he shared with us that he had recently discovered he is going to be a daddy!

Oh what joy! He is thrilled and so excited to be a dad. He has been working hard to get the things the baby will need, helping his in-laws renovate the house in time for baby and doing a wonderful job assisting and caring for mom-to-be. He has been to appointments, done research and preparing himself to be the best dad he can – just like his dad.

While Matthew does not attend church regularly with us, he puts forth every effort to be in attendance for special occasions and holidays and any time his dad is on the preaching schedule. He likes to support his dad in that way.

I have always known Matthew to be a gentleman. He opens and holds doors for others, he is helpful and respectful to older individuals at the grocery store and other public locations. He is attentive to those less fortunate and considerate of those who struggle due to impairments or disabilities. He shakes hands firmly and looks others in the eye, treating people with the respect they deserve.

As I mentioned before, I am also well aware of my son's negative traits, mistakes and misguided choices. I could list those as well, however, that is not the purpose of this note. I wanted to give you a broader picture of the Matthew I know beyond what appears to be the portrayal put forth in court today. A glimpse to how he lives in real life.

I can confidently say, Mr. Brockway, that my son is not a criminal and he would not intentionally hurt any individuals. He loves his family deeply and as a first-born son and father-to-be feels it is his responsibility to protect us and carry on the family legacy of hard work, devotion and love. He would not intentionally plan to hurt another person or

knowingly jeopardize being the father and head of family that we all need him to be, now and in the future.
Lastly, Matthew is a wonderful son to me. He's my first-born, the one that made me a mom. I feel nothing but loved, appreciated and cared for by him. We have had our ups and downs, as any healthy relationship does. We have grown together, we forgive when we need to, we prefer to work through the hard because on the other side is a better and stronger connection. We have laughed together and enjoy each other's companionship. We are learning to trust God in small ways and in big ones. We are looking forward with joy and anticipation to this new season where he gets to learn to be a dad, and I get to learn to be grandma. And tonight, I will certainly miss getting my text that says, "I love you mom" with a yellow heart emoji.

I will forever have seared in my memory the tears in his eyes as he was being led away and his request to give his mom a kiss being denied. However, I am determined to trust in God in this process, believing that soon this will be behind us and we can get back to all the things we love doing as family and passing on traditions to his sweet little son on the way.

Thank you for your patience in reading this very long letter from a broken-hearted momma.

And once again, thank you for your hard work on behalf of Matthew's defense.

Sincerely,

Rachel Souza

To whoever may read this,

My name is Nataliya Ilieva and I am the future mother-in-law of Matthew Alan Souza. I first met Matthew in early August of 2025. He had been courting my daughter for a month while we were on vacation and came to the home to introduce himself before taking her out on a date. He made a wonderful first impression by greeting me, my husband, and eldest daughter who was living with us at the time. He told us their intended plans and made sure he brought Nicole home at a reasonable time. It made an impression on me that he was a true gentleman. This was seen in the way he opened doors for her, paid for her meal, introduced himself to us and her, and even walked her to the front door at the end of the night.

Matthew came to live with us 6 months ago at the end of 2025. Nicole discovered that she was pregnant and she's in school full-time. We welcomed him into our home because we had the room to accommodate him and the baby that's on the way. It's evident that his priority is Nicole and the baby's well-being. A large reason in moving in was because Matthew was concerned that Nicole would be driving far to attend her classes at Kennesaw State University. The additional stress of travel was a large worry for him since he wouldn't be able to accompany her.

Me and Matthew have been able to grow our relationship over time through deep conversations about religion, advice about life, and other things that led us to understand one another better. He even began calling me mom just a month after moving in when we finally got to adjust to a routine. We often all sit down at the dinner table and chat about our days, listen to music from both our countries, talk about traditions, and even share recipes. He often cooks for my daughter to make sure that she is fed and meeting her nutritional intake for the baby. As well as getting her the proper supplies for the birth and overall preparation.

It warms my heart to see how well he tends to my daughter. His attentiveness has only grown during her pregnancy. When Nicole wasn't feeling well during her first trimester due to morning sickness and the hormonal changes - he took full responsibility to make sure that she was happy and healthy. Matthew has even researched meals and makes smoothies for everyone, and always makes sure we are striving to be healthier. He's even made meals for the whole family when the chance arises and it has been wonderful to be able to mix our cultures and traditions.

We as a blended family went to an easter event and he made sure to greet everyone, set the picnic table, prepared the food we brought, and participated in our cultures traditions while also introducing us to some of his. He even offered to drive separately in case our daughter, Nicole, didn't feel well and also to ensure she wasn't in the summer heat for too long without air conditioning.

I am now attending Nicole's pre-natal appointments since he has been detained, but before this, he made it a priority and responsibility that she wasn't alone or behind the wheel. Nicole's pregnancy has been harder for her since the stress and worry of the situation. She is still enrolled in school and will soon be attending her summer semester courses. He is the largest mental and financial support system for our daughter. It has been tough on our family since me and my husband both work full time.

My husband and I decided a month ago that it would be best to renovate our home to prepare for the needs of the baby. Matthew has been a huge help in preparing for the technician/work by removing flooring, bringing in heavy materials, buying materials, moving heavy furniture, and more. Matthew works diligently to make sure that me and my daughter aren't taking on too much. As well as making sure my husband is not pushing himself due to his health history. He never complains when it's been a long day of labor - even though sometimes it does get frustrating and is tiring.

Matthew also does the grocery shopping and makes sure in his shopping list that everyone is accounted for. He doesn't let anyone bring in the grocery bags to protect the health of my entire family. He is attentive in making sure that everyone has their needs met. It has been a huge help in this pivotal moment for all of us. Matthew even helps me make dinner, serve the food, and set the table. He has been not only a huge help to my daughter, but the whole family. My husband and him often are working on the cars and Matthew is always eager to learn from us. He is very aware that he is young and has much to learn in life. He's excited to become a father. He is always willing to learn more and strives to become a man that is greater than the one he was yesterday. He is someone who treats his elders with the utmost respect and it's evident to anyone who has met him.

Matthew is a kind, loving, and respectful young man. He has much to learn still and is doing his best. My husband and I are so grateful that he entered our lives and has taken care of our daughter in a way that we have prayed and wished for. I don't expect the court to overlook the case at hand, but I ask them to take into consideration that he is not a violent or malicious person. He is a young man that has much to learn still. We hope that he will be given the opportunity to grow, improve, and demonstrate the effort he is genuinely willing to put in.

Thank you,

Nataliya Ilieva

I met Matthew through my daughter in early August of 2025. He was her boyfriend at the time and are looking forward to getting married. My first impression of him was that he was a gentleman. He was respectful to the rest of my family and me, and I saw that he really cared for my daughter.

He moved in at the end of 2025, and as time went on, he quickly became part of the family unit. Matthew and my daughter are now expecting a baby boy towards early August. He is our future - as we get older and they begin their new family and life. Throughout my daughters pregnancy, he has continued to be very caring towards her, and has made sure she gets what she and the baby need. He is polite and very well-mannered.

Whenever something is being done around the house, he is there to help and assist, even if he is not sure what is being done. He will keep a positive attitude and encourage others around him as well. Due to my heart history, he will do most of the heavy lifting and tiring things to protect me. We even work on the cars together. He always wants to learn something new and is a very hard worker. I see him as the son I never had.

We are currently doing renovations to our home, and he has been very helpful the entire process by doing so many different tasks. When we sit down as a family for dinner, he interacts with everyone and is a fun person to be around. During dinner we like to watch all of our different interests on the TV. We have many conversations as a family - spending it laughing and eating. We have met his family as well, and they are just as welcoming, polite, and uplifting as he is. Matthew is a good boy and will be a great father from what I have seen in his relationship with my daughter.

Thank you,

Mariyan Zahariev

To Whom It May Concern:

As his great-grandmother, please accept this letter on behalf of Matthew Souza to expose Matthew's character from his birth in July 2001 to this very day. During each of our visits, Matthew was courteous, honest, respectful, fun, and displayed a vibrant and friendly personality. Matthew, as well as our other grandchildren and great-grandchildren, were remarkably family-oriented characters and, because I was "Munga", I vocally took credit for any complement each one would receive.

Matthew was the first child to raise my family status to the level of "great-grandmother". It was a sweet time for me and Matthew's presence in the family was an enormous blessing that continues to this day. Matthew is compassionate and helpful. The latest surprise and loving contact from Matthew a few months ago when I mentioned, by text to the family, that I was planning to purchase a new laptop since my 10-year-old desktop was on its last legs. Matthew immediately sent $69.00 to me via Zelle to contribute to the purchase. My response to Matthew was a very humble thank you while advising him that the purchase may be delayed for a while so I would return his gift until my plans were more definite. His response was: "NO Munga! You keep the money and use it for whatever plan you come up with. That money is for you." Such a generous young man.

This letter, I realize, is being submitted from a biased, loving, great-grandmother, but this message is being sent in sincere truth. Matthew is a responsible, loving young man that possesses talents and gifts that could be blessings for so many people.

Thank you for your time.

Sincerely,

Alta Schollaert
401 West Main Street
Apartment 303
Monongahela, PA 15063

5-20-26

To Whom It May Concern,

I am writing this letter as a character reference for Matthew Souza. I have known Matthew and his family for approximately eleven years. Matthew's mom and dad are dear friends of my wife and I, and we have been co-laborers in ministry in our local public schools, as well as co-pastors in a new church that we launched five years ago together with a core group of families.

Everything I have known about Matthew Souza is of him being a well-mannered, respectful, kindhearted young man. I was shocked when informed of his current situation, as that is not at all the Matthew that I've come to know and completely opposite of the faith and moral fabric of his family - of which he seemed to also embrace.

In my encounters with Matthew these past few weeks, he seems to have had a truly repentant and remorseful heart, desiring to turn his life towards faith, love, family, and fatherhood (in plans to be married and the expectant birth of their first child).

Matthew is a young man coming from an outstanding family with a solid foundation of faith and morals. From what I've experienced of Matthew, he seems be on track to being a contributing member of society and to his new family. He seems to have already been laying a good foundation and track record of behavior during these recent months.

Additionally, Matthew is in position for great success as he becomes a husband to his new wife and a father to his firstborn child. He has a great network of support from family and friends, outstanding potential, and proven character which all contribute to the healthy fabric of this new, young family.

Feel free to contact me if you'd like any additional information about my experiences and/or perspective on Matthew Souza and/or his family.

Blessings,

Drue

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May 18, 2026

To Whom It May Concern:

Re: Matthew Alan Souza

Dear Sir/Madam:

I am writing in support of Matthew Alan Souza. I had the privilege of serving as Matthew's youth leader for three years during his time in our high school group at Gwinnett Church. During that period, I came to know him as a kind, respectful, and thoughtful young man.

Matthew consistently showed respect toward adults, treated the other young men in the group with courtesy, and carried himself in a way that reflected good character. The situation that has led to his arrest is deeply concerning, but it is not consistent with the Matthew I knew. My sincere belief is that he became involved with the wrong crowd and made choices that do not reflect his true character or potential.

I respectfully ask the Court to consider the positive qualities Matthew has demonstrated and the person I believe he is capable of becoming.

Very Truly Yours,

Gary Martin Hays

May 13, 2026

To Whom It May Concern,

My name is Nicole, and I am currently 6½ months pregnant with my first child. I am under regular prenatal care and have been advised to minimize stress, maintain consistent support, and avoid physical strain as I progress into the later stages of pregnancy.

Throughout my pregnancy, Matthew has been my primary source of emotional and physical support. He assists me with daily tasks, transportation, medical appointments, and managing stress. His presence has been essential to my stability and well-being.

Due to the physical and emotional demands of pregnancy, especially in the third trimester, I am at increased risk for:

- elevated blood pressure
- stress-related complications
- preterm labor
- difficulty attending medical appointments alone
- difficulty managing daily responsibilities without support

The recent events, including the raid on our home and Matthew's detention, have significantly increased my stress levels. My medical providers have emphasized the importance of reducing stress and maintaining a stable support system for the health of both myself and the baby.

Matthew's continued support is important for:

- transportation to prenatal appointments
- assistance with daily activities
- emotional stability
- preparation for childbirth
- ensuring a safe and healthy environment for the baby
- Financial support

I respectfully ask that the Court consider my medical needs and the role Matthew plays in supporting my pregnancy. His presence is not only important to me emotionally, but also to my physical health and the well-being of our unborn child.

Thank you for your consideration.

Respectfully,
Nicole Marian Kirilova